

Case A-821-816

February 7, 2002

The Honorable Faryar Shirzad
Assistant Secretary for Import Administration
International Trade Administration
U.S. Department of Commerce

Dear Mr. Secretary:

In response to the ITA's Inquiry into the Status of the Russian Federation as a Non-Market Economy Country Under the Antidumping and Countervailing Duties, I hereby submit the enclosed rebuttal comments on behalf of a broad cross-section of our member companies, including Bechtel National Inc., Ford Motor Company, Hogan & Hartson L.L.P., Lockheed Martin Corporation, Troika Dialog, and United Technologies Corporation, among others. This memo is a response to the public comments posted on the ITA website at <http://www.ia.ita.doc.gov/download/russia-nme-status/russia-nme.html>.

The U.S.-Russia Business Council has framed its rebuttal based on the determining factors listed in the Commerce Department's October 26, 2001 *Notice of Initiation of Inquiry Into the Status of the Russian Federation as a Non-Market Economy Country Under the Antidumping and Countervailing Duties*.

The U.S.-Russia Business Council supports the approval of Russia's application for market economy status. The Council, a nonprofit trade association formed in early 1993, has accumulated a wealth of corporate experience and in-depth historical perspective on Russia's decade of transition. The Council's 260 member companies represent virtually every major player and every industry sector active in U.S.-Russian trade and investment. Through our broad membership base, the Council plays a vital role in forging a public-private dialogue that makes tangible contributions to U.S.-Russian commercial relations. We hope the enclosed investor comments, representing U.S. companies with substantial operating experience in Russia, will contribute to a balanced review of Russia's market economy application.

Should you require further information, or if I can answer any questions, please contact me at (202) 739-9181. Thank you for considering our position.

Sincerely,

Eugene K. Lawson

enclosure

